

EXHIBIT 2

Lawrence Jarvis

From: Jon Ma <jma@raklaw.com>
Sent: Monday, July 21, 2025 9:07 PM
To: Lawrence Jarvis
Cc: rak_wilus@raklaw.com; Andrea Fair; Service – FR HP/Wilus; melissa@gillamsmithlaw.com
Subject: Re: Wilus Institute of Standards and Technology Inc., v. HP Inc., 2:24-cv-0752 (lead case): ESI Discovery

Hi Lawrence,

To reiterate, Sisvel does not agree to reviewing/producing ESI documents at this time, including pending the Court's ruling on Sisvel's pending motion to dismiss. Sisvel objects to ESI discovery at least for the reasons I've stated on our call. Sisvel will reevaluate its position following the ruling. That said, Sisvel does not object to the following ESI dates between HP and Sisvel:

1. Identification of email custodians: August 29
2. Exchange of initial search terms: September 12
3. Finalize search terms: October 3

This should not be construed in any way to suggest that Sisvel agrees to reviewing/producing ESI documents. Sisvel reserves all rights, including to seek a stay on discovery.

Best,
Jon

Jon Ma
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor | Los Angeles, California 90025
Main +1 310 826 7474 | jma@raklaw.com

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On Jul 17, 2025, at 7:45 PM, Lawrence Jarvis <jarvis@fr.com> wrote:

Hi Jon,

Thanks for the meet and confer last Friday. Please let us know if your client, Sisvel, is willing participate in ESI discovery. As you know, Local Rule CV-26 explicitly states that "a party is not excused from responding to discovery because there are pending motions to dismiss."

If Sisvel is unwilling to participate and comply with its discovery obligations, please let us know your availability for a meet and confer next week.

Thanks,